

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

Plaintiffs' Master Administrative Long-
Form Complaint and:

Floyd Little, et al. v. National Football
League, et al. (Plaintiffs Claudie Minor, Jr.
and Vicki Ann Minor ONLY)

Court File No. 2:12-cv-2219-AB

**PETITION TO ESTABLISH
ATTORNEY'S LIEN**

Petitioner, Brian C. Gudmundson for Zimmerman Reed LLP ("Zimmerman Reed"), pursuant to Minn. Stat. § 481.13 and pursuant to the executed Agreement for Legal Services section titled "Termination" petitions and states as follows:

1. Petitioner is an attorney at law admitted to practice before the courts of Minnesota and files this Petition to establish a lien for attorney's fees as set forth hereinafter.

2. On or about March 1, 2012, Petitioner was retained and employed by the Plaintiffs, Claudie Minor, Jr. and Vicki Ann Minor, pursuant to an agreement for legal services, to pursue a claim for injuries and damages allegedly caused by the National Football League's conduct associated with football-related concussions, head, and brain injuries.

3. The specifics of the agreement for legal services are as follows: If no recovery (by settlement or trial) is obtained client will not owe a legal fee. If Zimmerman Reed obtains a settlement or judgment for Client, Client will pay to Zimmerman Reed twenty percent (20%) of the gross recovery plus reimbursement of expenses.

4. When Petitioner entered into a contract with Plaintiffs, Petitioner entered into the risk and expense of the litigation before any settlement discussion had been held. Pursuant to this agreement, the Petitioner filed a Complaint on April 24, 2012, in this matter on behalf of the Plaintiffs, which is the subject of the instant action.

5. From the date the Petitioner was authorized to proceed on behalf of the Plaintiffs, the Petitioner has actively and diligently investigated, prepared, and pursued Plaintiffs' claims, and has taken all steps necessary to prosecute those claims, including, but not limited to, the preparation and filing of complaints, correspondence and communications with the clients, preparation and review of clients factual and legal circumstances, retaining experts, drafting and providing client updates, analyzing Plaintiff's medical status and need for medical testing, obtaining medical testing through the Baseline Assessment Program, and more.

6. During the litigation, Petitioner's partner, Charles S. Zimmerman, served on the Plaintiffs' Steering Committee, which has inured to the Plaintiff's benefit with Zimmerman Reed's representation.

7. The Plaintiff has retained new counsel to represent him in this action, which Plaintiff communicated to the Claims Administrator, and which the Claims Administrator communicated to Petitioner.

8. Petitioner was not terminated due to any malfeasance or other improper action.

9. The Petitioner claims the right to have a lien for attorney's fees and expenses established and enforced upon any sums to be derived from any settlement or judgment obtained or to be obtained by Plaintiff in this action.

WHEREFORE, the Petitioner prays:

1. That an attorney's lien be established;
2. That the amount of the lien be determined;
3. That the Court order that Petitioner be entitled to enforce an attorney's lien against the proceeds to be derived from any settlement or judgment in this action;
4. That the Defendant or the Defendant's insurer be prohibited from paying to the Plaintiffs any sums of money until said lien has been satisfied; and
5. For such other further relief as this Court deems just.

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Dated: August 11, 2021

Respectfully submitted,

ZIMMERMAN REED LLP

s/ Brian C. Gudmundson

J. Gordon Rudd, Jr. (#222082)

Brian C. Gudmundson (#336695)

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CERTIFICATE OF SERVICE

I hereby certify that I caused the foregoing Petition to Establish Attorney's Lien to be served via the Electronic Case Filing (ECF) system in the United States District Court for the Eastern District of Pennsylvania, on all parties registered for CM/ECF in the litigation.

Dated: August 11, 2021

ZIMMERMAN REED LLP

s/ Brian C. Gudmundson

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